

Difference between estimated and measured WERs

Upon conducting an initial analysis of the 2007 dataset, it was determined that the **estimated** SMAV WER (column ~~AB~~AC) using the DOC regression equation above (as copied from Table 5; MDEQ 2007) resulted in several cases where the calculated site-specific FCV (column ~~AD~~AE) appears to be less protective than the FCV calculated (column ~~AE~~AF) using the SMAV WER derived from the **measured** WER (column ~~AC~~AD), with differences in the resulting criteria up to a factor of 3-4 (less protective criteria when comparing MDEQ's proposed approach in ~~AD~~AE to the criteria calculated using the actual WER derived from the study in ~~AE~~AF are highlighted in column ~~AE~~AF). Initial analysis of this same dataset using EPA's BLM criteria calculations (humic acid default of 10% used for calculations) showed that about 2 of 3 FCV calculations using MDEQ's SSC approach appear to be more protective than the CCCs (column ~~AF~~AG) determined using the BLM (BLM derived CCCs that are more protective than the criteria derived using MDEQ's approach are highlighted in column ~~AF~~AG). Thus, it appears that this initial analysis suggests that MDEQ's approach may not always result in SSC that are as protective as suggested to be necessary using the measured toxicity values to calculate the SMAV WER.